

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re:

deeproot Capital Management, LLC, *et al.*,¹
Debtors.

Chapter 7

Case No. 21-51523 (MMP)
(Jointly Administered)

SUBPOENA RESPONDENTS' WITNESS AND EXHIBIT LIST FOR SEPTEMBER 1, 2022 HEARING

Cycladic International, LLC, (“*Cycladic International*”), Cycladic, LLC (“*Cycladic*”), and Thomas N. Andrew (“*Andrew*” and together with Cycladic International and Cycladic, the “*Subpoena Respondents*”) file this *Witness and Exhibit List* for all matters scheduled to be heard on September 1, 2022 at 10:30 a.m. (the “*Hearing*”) including the below matters:

1. *Expedited Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum* (the “*Motion*”) [Dkt. No. 137].

I.
WITNESSES

Subpoena Respondents may call any of the following as witnesses at the Hearing:

1. Any witnesses called by any other party.
2. Any witness necessary to authenticate a document.
3. Any rebuttal witnesses, as needed.

¹ The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor’s federal tax identification number, are: *In re Policy Services, Inc.*, 21-51513 (2864), *In re Wizard Mode Media, LLC*, 21-51514 (3205), *In re deeproot Pinball LLC*, 21-51515 (0320), *In re deeproot Growth Runs Deep Fund, LLC*, 21-51516 (8046), *In re deeproot 575 Fund, LLC*, 21-51517 (9404), *In re deeproot 3 Year Bonus Income Debenture Fund, LLC*, 21-51518 (7731), *In re deeproot Bonus Growth 5 Year Debenture Fund, LLC*, 21-51519 (9661), *In re deeproot Tech LLC*, 21-51520 (9043), *In re deeproot Funds LLC*, 21-51521 (9404), *In re deeproot Studios LLC*, 21-51522 (6283), and *In re deeproot Capital Management, LLC*, 21-51523 (2638).

II.
EXHIBIT LIST

The exhibits that Subpoena Respondents intends to utilize at the Hearing are as follows:

Exh. No.	Exhibit Description (All exhibits include all attachments and exhibits filed into the record)	Offered	Objection	Admitted/Not Admitted
1.	Trustee's Notice of Intention to Take Rule 2004 Examinations with Subpoena Duces Tecum [Filed at Dkt. No. 129 and Ex. B to the Motion at Dkt. No. 137-2]			
2.	Trustee's Summary of Life Insurance Policy Purchase Agreements Between Policy Services, Inc. and Anemos Consulting, Inc., Dover Capital Strategies LLC, and Cycladic, LLC [Prepared by the Trustee and Provided to Counsel to Cycladic on August 30, 2022 at 5:25 p.m.]			

Subpoena Respondents reserve the right to utilize additional rebuttal exhibits as necessary.

Subpoena Respondents reserve the right to supplement this Exhibit List. Subpoena Respondents reserve the right to use as its own exhibit any exhibit identified or offered by any other party.

DATED August 31, 2022.

Respectfully Submitted,

/s/ Stephen J. Humeniuk

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***Counsel for Cycladic International, LLC;
Cycladic, LLC; and Thomas N. Andrew***

CERTIFICATE OF SERVICE

The undersigned certifies that on August 31, 2022, true and correct copies of the foregoing were forwarded to all parties receiving electronic notification in this case from the Court's electronic case filing (ECF) system, including the parties identified immediately below:

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